

October 16, 2019

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Via SCPSC E-FILING DMS

Re: South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to Dominion Energy South Carolina, Incorporated and S.C. Code Ann. Section 58-41-30 Related to Electrical Utilities and Their Current Voluntary Renewable Energy Program, and Such Other Proceedings Required By the Commission;

Docket No. 2019-209-E

Dear Ms. Boyd:

Please find attached for electronic filing with the Public Service Commission of South Carolina a copy of the Petition to Intervene of Walmart Inc., in the above-referenced case. By copy of this letter, I am serving all parties of record via electronic mail and/or first-class mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton
(SC Bar No. 80073)

Carrie Harris Grundman
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Counsel to Walmart Inc.

SUE/sds
Attachments
c: Certificate of Service

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2019-209-E

IN RE: South Carolina Energy Freedom Act (House Bill 3659) Proceeding Related to Dominion Energy South Carolina, Incorporated and S.C. Code Ann. Section 58- 41-30 Related to Electrical Utilities and Their Current Voluntary Renewable Energy Program, and Such Other Proceedings Required By the Commission))))))))	CERTIFICATE OF SERVICE
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I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via electronic mail and/or first-class mail:

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 Matthew Gissendanner, Esquire
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A handwritten signature in black ink, appearing to read 'SUE', is positioned above a horizontal line.

Stephanie U. Eaton (SC Bar No. 80073)

Dated: October 16, 2019

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2019-209-E

IN RE: South Carolina Energy Freedom Act)	
(House Bill 3659) Proceeding Related to)	
Dominion Energy South Carolina,)	PETITION TO INTERVENE OF
Incorporated and S.C. Code Ann. Section 58-)	WALMART INC.
41-30 Related Electrical Utilities and Their)	
Current Voluntary Renewable Energy)	
Program, and Such Other Proceedings)	
Required by the Commission)	

Pursuant to Rule 103-825 and other applicable rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On June 11, 2019, the Commission initiated this proceeding to review Dominion Energy South Carolina, Incorporated's ("DESC" or "Company") current Voluntary Renewable Energy Program, pursuant S.C. Code Ann. § 58-41-30.
2. On September 13, 2019, DESC filed its proposed Voluntary Renewable Energy ("VRE") Rider, pursuant to S.C. Code Ann. § 58-41-30.
3. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2001 SE 10th Street, Bentonville, AR 72716-5530.
4. Walmart has the privilege of providing its retail services throughout the State of South Carolina, operating 128 facilities, including 84 Supercenters, four Distribution Centers, 27

Neighborhood Markets, and 13 Sam's Clubs.¹ Within the DESC service territory, Walmart is a large commercial customer, purchasing approximately 140 million kWh annually, and operating 34 retail stores and facilities, including Walmart Supercenters, Sam's Clubs, and gas stations. Electricity is one of the largest operating costs faced by Walmart. As such, Walmart has a direct and substantial interest in the outcome of this proceeding.

5. In addition, Walmart has a substantial interest in the development and use of renewable energy in South Carolina as it has established aggressive and significant company-wide renewable energy goals, including: (a) to be supplied 50 percent by renewable energy by 2025, and, ultimately, (b) to be supplied 100% by renewable energy.²

6. As a large commercial customer that purchases substantial amounts of electricity and related services from DESC pursuant to multiple accounts at multiple locations, Walmart has a direct and substantial interest in this proceeding that is not represented by any other party.

7. The attorneys representing Walmart in this proceeding are:

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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Grundmann be added to the service list as Walmart may seek Mr. Williamson's and/or Ms. Grundmann's admission to appear before the Commission *pro hac vice* in the near future.

¹ <https://corporate.walmart.com/our-story/our-locations#/united-states/south-carolina>


² <https://corporate.walmart.com/global-responsibility/environmental-sustainability>

5. This Petition to Intervene is timely filed as the Commission has not yet established an intervention deadline.

WHEREFORE, Walmart Inc., respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 
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